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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,

13 Case No.: 2:20-cr-00319-JCM-EJY

14 Plaintiff,

15 **STIPULATION TO CONTINUE CHANGE**
16 **OF PLEA HEARING**

17 vs.
18 RAUL ESTRADA-COVARRUBIAS,

19 **(First Request)**

20 Defendant.

21 IT IS STIPULATED AND AGREED, between Ross C. Goodman, Esq., counsel for
22 Defendant Raul Estrada-Covarrubias and Jason M. Frierson, Esq., United States Attorney, and
23 Brenna Bush, Esq., Assistant United States Attorney that the Change of Plea Hearing currently
24 scheduled for December 13, 2024, shall be vacated and rescheduled to January 10, 2025, at
25 10:30 a.m.

26 The stipulations are entered for these reasons:

27 1. The Government provided a revised section to the factual basis of the plea
28 agreement.

29 2. The amended plea agreement will be translated into Spanish after which
30 Defendant's Counsel will schedule a call to review with him.

31 3. Defendant is in custody and does not object to the continuance.

32 4. The parties agree to the continuances.

33 5. This request is not made for the purpose of undue delay but is necessary to

1 complete plea negotiations.

2 6. Additionally, denial of this request for continuance could result in a miscarriage
 3 of justice. The additional time requested by this stipulation is excludable in computing the time
 4 within which the trial must commence pursuant to the Speedy Trial Act, Title 18, United States
 5 Code, Section 3161(h)(3)(D), 3161(h)(7)(A), 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).
 6

7 This is the parties' first request for a continuance relating to the Change of Plea hearing.
 8 The court previously rescheduled the plea hearing from November 18, 2024, to November 20,
 9 2024, due to court construction. However, Mr. Goodman was unavailable on November 20th and
 10 the date was changed to December 10, 2024.

11 Dated this 10th day of December 2024.

12 ROSS C. GOODMAN, ESQ.
 13 Appointed Counsel for Defendant

14 /s/ *Ross C. Goodman, Esq.*
 15 By _____
 16 Ross C. Goodman, Esq.
 17 Attorney Raul Estrada-Covarrubias

18 JASON M. FRIERSON
 19 United States Attorney

20 /s/ *Brenna Bush, Esq.*
 21 By _____
 22 Brenna Bush, Esq.
 23 Assistant United States Attorney

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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,

13 Case No.: 2:20-cr-00319-JCM-EJY

14 Plaintiff,

15 **ORDER**

16 vs.

17 RAUL ESTRADA-COVARRUBIAS,

18 Defendant.

19 **FINDINGS OF FACT**

20 Based on the Stipulation of counsel and good cause appearing therefore, the Court finds:

21 1. The Government provided a revised section to the factual basis of the plea
22 agreement.

23 2. The amended plea agreement will be translated into Spanish after which
24 Defendant's Counsel will schedule a call to review with him.

25 3. Defendant is in custody and does not object to the continuance.

26 4. The parties agree to this first request for continuance. The court previously
27 rescheduled the plea hearing from November 18, 2024, to November 20, 2024, due to court
28 construction. However, Mr. Goodman was unavailable on November 20th and the date was
changed to December 10, 2024.

29 5. This request is not made for the purpose of undue delay but is necessary to
30 complete plea negotiations.

6. Additionally, denial of this request for continuance could result in a miscarriage of justice.

7. For all the above-stated reasons, the ends of justice would be best served by a continuance of the objection to report and recommendation and trial date.

CONCLUSIONS OF LAW

The ends of justice served by granting said continuances outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

The continuance sought herein excludable under the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(3)(D), 3161(h)(7)(A), 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).

ORDER

IT IS HEREBY ORDERED that the Change of Plea hearing currently scheduled for December 10, 2024, shall be vacated and set for January 10, 2025, at 10:30 a.m.

DATED 1 December 11, 2024.

James C. Mahan
HONORABLE JAMES C. MAHAN
UNITED STATES DISTRICT COURT JUDGE